

(12/04)

Board Meeting
September 12, 2006Agenda Item 14
Attachment 1

Five-Year CIWMP/RAIWMP Review Report Template

Public Resources Code (PRC) Sections 41770 and 41822, and Title 14, California Code of Regulations (CCR) Section 18788 require that each countywide or regional agency integrated waste management plan (CIWMP/RAIWMP), and the elements thereof, be reviewed, revised, if necessary, and submitted to the California Integrated Waste Management Board (Board) every five years. This Five-CIWMP/RAIWMP Review Report template was developed in an effort to provide a cost-effective method to streamline the Five-CIWMP/RAIWMP review and reporting process. The purpose of this Five-CIWMP/RAIWMP Review Report template is to document compliance with these regulatory review and reporting requirements and to request Board approval of the Five-CIWMP or RAIWMP Review Report findings.

After reviewing and considering the Local Task Force (LTF) comments submitted to the county or regional agency and the Board on areas of the CIWMP or RAIWMP that need revision, if any, the county or regional agency may use this template for its Five-CIWMP or RAIWMP Review Report. The Five-County or Regional Agency Integrated Waste Management Review Report Guidelines describe each section of this template and provide general guidelines with respect to preparing the report. Completed and signed reports should be submitted to the Office of Local Assistance (OLA) at the address below. Please know that upon submittal, OLA staff may request additional information if the details provided in this form are not clear or are not complete. Within 90 days of receiving a *complete* Five-CIWMP/RAIWMP Review Report, OLA staff will review the request and prepare an agenda item with their findings for Board consideration.

If you have any questions about the Five-CIWMP/RAIWMP Review process or how to complete this form, please contact your OLA representative at (916) 341-6199. Mail completed and signed Five-CIWMP/RAIWMP Review Reports to:

California Integrated Waste Management Board
Office of Local Assistance, MS-25
P. O. Box 4025
Sacramento, CA 95812-4025

Form can be unlocked and modified (e.g., adding rows to tables) by clicking on the "Protect Form" icon in the forms tool bar. If you have any questions, please contact your OLA representative at (916) 341-6199.



General Instructions

Please complete Sections 1 through 9, and then all other applicable subsections.

SECTION 1.0 COUNTY OR REGIONAL AGENCY INFORMATION			
I certify that the information in this document is true and correct to the best of my knowledge, and that I am authorized to complete this report and request approval of the CIWMP or RAIWMP Five-Review Report on behalf of:			
County or Regional Agency Name Sierra County Regional Agency		County Sierra	
Authorized Signature 		Title Public Works Director	
Type/Print Name of Person Signing Tim H. Beals	Date	Phone (530) 289-3201	
Person Completing This Form (please print or type) Craig Morgan, P.E.	Title	Phone (530) 543-3200	
Mailing Address P.O. Box 550218	City South Lake Tahoe	State CA	Zip 96155
E-mail Address			

TABLE OF CONTENTS

<u>Section</u>	<u>Description</u>	<u>Page</u>
1.0	COUNTY OR REGIONAL AGENCY INFORMATION	1
2.0	BACKGROUND	3
3.0	LOCAL TASK FORCE REVIEW	4
4.0	TITLE 14, CALIFORNIA CODE of REGULATIONS SECTION 18788 (3) (A) THROUGH (H) ISSUES	5
4.1	Changes in Demographics in the County or Regional Agency	
4.2	Changes in Quantities of Waste within the County or Regional Agency; and Changes in Permitted Disposal Capacity and Quantities of Waste Disposed in the County or Regional Agency	
4.3	Changes in Funding Source for Administration of the Siting Element and Summary Plan	
4.4	Changes in Administrative Responsibilities	
4.5	Programs that were Scheduled to be Implemented but were not	
4.6	Changes in Available Markets for Recyclable Materials	
4.7	Changes in the Implementation Schedule	
5.0	ANNUAL REPORT REVIEW	14
6.0	OTHER ISSUES	14
7.0	SUMMARY of FINDINGS	15
8.0	REVISION SCHEDULE	15
9.0	SUPPLEMENTARY INFORMATION	15

SECTION 2.0 BACKGROUND

This is the regional agency's first Five-Review Report since the approval of the CIWMP or RAIWMP.

The jurisdictions in the regional agency include City of Loyalton and the unincorporated area of Sierra County.

- ☒ Each jurisdiction in the regional agency has a diversion requirement of 50% for 2000 and each year thereafter. No petition for a reduction in to the 50% requirement or time extension has been requested by any of the member agencies.
- ☐ One or more of the jurisdictions in the regional agency has an alternative diversion requirement or time extension. The details are provided in the table below.

Jurisdiction	Type of Alternative Diversion Requirement	Diversion Requirement (%)	Goal/Extension Date
	Click here for drop down menu		
	Click here for drop down menu		
	Click here for drop down menu		
	Click here for drop down menu		
	Click here for drop down menu		

Additional Information (e.g., recent regional agency formation, newly incorporated city, etc.)

SECTION 3.0 LOCAL TASK FORCE REVIEW

1. The Local Task Force (LTF) includes the following members:

☐ Please see Attachment for additional information.

Name	Representative Of (e.g., City or County)
Arnold Gutman	Sierra County
Peter Huebner	Sierra County
Tim Beals	Sierra County
Bill Copren	Sierra County
Mike Moore	City of Loyalton
Heather Newell	U.S. Forest Service
Todd Sloan	Sierra County Public Member
Hood Disposal	Refuse Hauler
2 Public Members	Vacant - to be appointed
3 Business Members	Vacant - to be appointed

2. In accordance with Title 14 CCR, Section 18788, the LTF reviewed each element and plan included in the CIWMP or RAIWMP and finalized its comments:

☒ At the January 19, 2006 LTF meeting. ☐ Other (Explain): _____

3. The regional agency received the written comments from the LTF on January 18, 2006, beginning the 45-day period for submitting the Five-CIWMP/RAIWMP Review Report to the Board and the LTF.

4. A copy of the LTF comments:

☒ is included as Appendix A.

☒ was submitted to the Board on January 18, 2006.

5. In summary, the LTF comments conclude that the Regional Agency's Intergrated Waste Management Plan does not require revision at this time.

**SECTION 4.0 TITLE 14, CALIFORNIA CODE of REGULATIONS SECTION 18788 (3)
(A) THROUGH (H)**

The subsections below address not only the areas of change specified in the regulations, but also provide specific analysis regarding the continued adequacy the planning documents in light of those changes, including a determination as to whether each necessitates a revision to one or more of the planning documents.

Section 4.1 Changes in Demographics in the County or Regional Agency

The following tables document the demographic changes in the regional agency since 1991. The analysis addresses the adequacy of the planning documents in light of these changes and the need, if any, for revision.

- ☒ The residential/non-residential generation percentages have not changed significantly since the preparation of the planning documents.
- ☐ The residential/non-residential generation percentages have changed significantly since the preparation of the original planning documents. The following table documents the new percentages and the data source (i.e., corresponding Board-approved new generation study).

Table 1. Sources of Generation

JURISDICTION	RESIDENTIAL PERCENTAGE		NON-RESIDENTIAL PERCENTAGE	
	OLD	NEW	OLD	NEW
Sierra County Regional Agency	N/A	N/A	N/A	N/A

Sources (e.g., Board-approved new or corrected 1999 generation study):
<http://boardnet.ciwm.ca.gov/juris/reports/BaseYear.asp>

Table 2. Demographics*

POPULATION			
Population For Each Jurisdiction	1991	2003	% Change
Sierra County Regional Agency	3,320	3,570	7.5
Countywide Population			

EMPLOYMENT			
Employment Factor For Each Jurisdiction	1991	2003	% Change
Countywide Employment	950	810	-14.74

TAXABLE SALES TRANSACTIONS			
Taxable Sales Factor For Each Jurisdiction	1991 (x1000)	2003 (x1000)	% Change
Sierra County Regional Agency	8,512	11,792	38.53
Countywide Taxable Sales Transactions	13,907	20,803	49.59

Consumer Price Index			
Statewide Consumer Price Index	1991	2003	% Change
	140.6	190.4	20.1

*Source: ☒ Board's Default Adjustment Factors
(<http://www.ciwmb.ca.gov/LGTools/DivMeasure/JuAdjFac.asp>) ☐ Other:
Additional Information

Table 3. Dwelling Information

Jurisdiction	1991 Single Family Dwellings	2003 Single Family Dwellings	% Change	1991 Multi- Family Dwellings	2003 Multi- Family Dwellings	% Change	1991 Mobile Homes	2003 Mobile Homes	% Change
Sierra County	1754	1893	7.92	163	110	-32.52	265	233	-12.08

Source: City/County Population And Housing Estimates, 1991-2000, with 1990 Census Counts (CA Department of Finance), E-5 City / County Population and Housing Estimates, 2005, Revised 2001-2004, with 2000 DRU Benchmark (CA Department of Finance). **Note:** Since no dwelling figures were available for the Regional Agency, County-wide figures are used in this table.

Analysis

- ☒ These demographic changes do not warrant a revision to any of the regionwide planning documents. The basis for this determination is provided below.
- ☐ These demographic changes warrant a revision to one or more of the regionwide planning documents. Specifically, .

Section 4.2 Changes in Quantities of Waste within the County or Regional Agency; and Changes in Permitted Disposal Capacity and Waste Disposed in the County or Regional Agency

1. Changes in Quantities of Waste within the County or Regional Agency (as it relates to diversion program implementation)

The data below document changes in reported disposal compared to original SRRE projections. Additionally, the Biennial Review findings for each jurisdiction are provided in Table 6 below to demonstrate progress in implementing the SRRE and achieving diversion mandates. The analysis at the end of this section addresses how these changes are being addressed (e.g., how existing, new or planned programs deal with the reported changes in the quantities of waste) relative to the jurisdictions' ability to meet and maintain the diversion goal and the need, if any, for a revision to one or more of the planning documents.

Disposal

The following table provides disposal data for the regional agency from the Solid Waste Generation Study (1991) and each jurisdiction's Annual Reports (1995 through 2002).

Table 4. Disposal Totals (Tons)

Year	1991	1995	1996	1997	1998	1999	2000	2001	2002
Sierra County Regional Agency	3,148	2,796	2,391	2,818	2,525	2,399	2,820	2,621	2,420

Sources (e.g., the Board's *Jurisdiction Disposal and Alternative Daily Cover Tons by Facility* <http://www.ciwmb.ca.gov/LGCentral/drs/reports/JurDspFa.asp>, *Single-year Countywide Origin Detail* at <http://www.ciwmb.ca.gov/LGCentral/drs/reports/Origin/WFOrgin.asp>): Waste disposal tonnage for years 2001 and 2002 include adjustments of 100 tons each as reported in the Regional Agency's Annual Reports.

Table 5. Comparison of SRRE-2000 Projected Disposal Tonnage vs. 2000 Disposal Totals

The following table is a comparison of the SRRE-projected disposal tonnage to the 2000 disposal tonnage reported for each jurisdiction.

Jurisdiction	SRRE 2000 Projected	Disposal 2000 Reported	% Difference
Sierra County Regional Agency	1,783	2,820	58%

Sources (e.g., the Board's *Jurisdiction Disposal and Alternative Daily Cover Tons by Facility* <http://www.ciwmb.ca.gov/LGCentral/drs/reports/JurDspFa.asp>, *Single-year Countywide Origin Detail* at <http://www.ciwmb.ca.gov/LGCentral/drs/reports/Origin/WFOrgin.asp>): Jurisdiction's SRRE, <http://www.ciwmb.ca.gov/LGCentral/DRS/Reports/Origin/WFOrgin.asp>

STATE OF CALIFORNIA
(12/04)

INTEGRATED WASTE MANAGEMENT BOARD

Diversion

The Biennial Review findings for the regional agency and associated cities are listed in Table 6 to demonstrate each jurisdiction's progress in implementing its SRRE and achieving the mandated diversion requirements. Additionally, following these data is an explanation of any significant changes in diversion rate trends (e.g., report year tonnage modification, new or corrected Solid Waste Generation Study, newly implemented programs).

Table 6. Biennial Review Data for Sierra Regional Agency Jurisdictions (1995 to 2003)

Jurisdiction	Year	Diversion Rate	Biennial Review Status
Sierra County Regional Agency	1995	10%	Board Approved Good Faith Effort
	1996	23%	Board Approved Good Faith Effort
	1997	19%	* Board Accepted
	1998	11%	Board Accepted
	1999	29%	Board Approved Good Faith Effort
	2000	13%	Board Approved Good Faith Effort
	2001	23%	Board Approved Good Faith Effort
	2002	32%	Board Approved Good Faith Effort
	2003	16%	Priliminary Data Only
	Click here for drop down	%	Click here for drop down menu

Sources (e.g., the Board's *Countywide, Regionwide, and Statewide Jurisdiction Diversion Progress Report*
<http://www.ciwmb.ca.gov/LGTools/MARS/jurdrsta.asp>):
<http://www.ciwmb.ca.gov/LGTools/MARS/jurdrsta.asp>

Explanation of Disposal and Diversion Rate Trends (if applicable)

- ☒ These changes in quantities of waste, as they relate the meeting and maintaining the mandated diversion goals, do not warrant a revision to any of the regionwide planning documents. The basis for this determination is provided in the analysis section below.
- ☐ These changes in quantities of waste, as they relate the meeting and maintaining the mandated diversion goals, warrant a revision to one or more of the regionwide planning documents. Specifically, .

STATE OF CALIFORNIA
(12/04)

INTEGRATED WASTE MANAGEMENT BOARD

2. Changes in Permitted Disposal Capacity and Quantities of Waste Disposed in the County or Regional Agency

The following addresses whether changes in permitted disposal capacity and waste quantities (both imported from out of county and generated in the county) affect the county's ability to maintain 15 years of disposal capacity and includes a determination regarding the need for planning document revision.

- ☒ The county or regional agency (if it includes the entire county) continues to have adequate disposal capacity (i.e., greater than 15 years). Supporting documentation is provided in Attachment No. 1.
- ☐ The regional agency does not have 15 years remaining disposal capacity. The analysis below provides the strategy for obtaining 15 years remaining disposal capacity. Attached is a revision schedule for the SE.

Analysis

Section 4.3 Changes in Funding Source for Administration of the Countywide Siting Element (SE) and Summary Plan (SP)

The regional agency has experienced the following changes in the funding of the SE or SP:

- No changes have occurred in the basic funding sources for the administration of the SE and the SP. Parcel assessments, service fees, grant funds, tax revenues, and solid waste management fees are still the source of funds for IWMP program development, implementation, and monitoring.

Analysis

- ☒ There have been no changes in funding source administration of the SE and SP or the changes that have occurred do not warrant a revision to any of the regionwide planning documents.
- ☐ These changes in funding source for the administration of the SE and SP warrant a revision to one or more of the regionwide planning documents. Specifically, _____.

Section 4.4 Changes in Administrative Responsibilities

STATE OF CALIFORNIA
(12/04)

INTEGRATED WASTE MANAGEMENT BOARD

The regional agency has experienced changes in the following administrative responsibilities:

- No changes have occurred in the administration of the IWMP. The County Public Works Department is the chief County administrative unit responsible for AB 939 and waste management programs

Analysis

- ☒ These changes in administrative responsibilities do not warrant a revision to any of the planning documents.
- ☐ These changes in administrative responsibilities warrant a revision to one or more of the planning documents. Specifically, .

Section 4.5 Programs that Were Scheduled to Be Implemented But Were Not

1. Progress of Program Implementation

- a. Source Reduction and Recycling Element (SRRE) and Household Hazardous Waste Element (HHWE)

☐ All program implementation information has been updated in the Board's Planning and Reporting Information System (PARIS), including the reason for not implementing specific programs, if applicable. Additionally, the analysis below addresses the progress of the programs that have been implemented.

☒ All program implementation information has not yet been updated in PARIS. Attachment No. 2 lists the SRRE and/or HHWE programs selected for implementation but which have not been implemented, including a statement as to why they were not implemented. Additionally, the analysis below addresses the progress of the programs that have been implemented.

- b. Nondisposal Facility Element (NDFE)

☐ There have been no changes in the use of nondisposal facilities (based on the current NDFE).

☒ Attachment No. 3 lists changes in the use of nondisposal facilities (based on the current NDFE).

- c. Countywide Siting Element (SE)

☐ There have been no changes to the information provided in the current SE.

☒ Attachment No. 4 lists changes to the information provided in current the SE.

- d. Summary Plan

☒ There have been no changes to the information provided in the current SP.

☐ Attachment lists changes to the information provided in current the SP.

STATE OF CALIFORNIA
(12/04)

INTEGRATED WASTE MANAGEMENT BOARD

2. Statement regarding whether Programs are Meeting their Goals

- ☐ The programs are meeting their goals.
- ☒ The programs are not meeting their goals. The discussion that follows in the analysis section below addresses the contingency measures that are being enacted to ensure compliance with PRC Section 41751 (i.e., what specific steps are being taken by local agencies, acting independently and in concert, to achieve the purposes of the California Integrated Waste Management Act of 1989) and whether the listed changes in program implementation necessitate a revision of one or more of the planning documents.

Analysis

- ☒ The aforementioned changes in program implementation do not warrant a revision to any of the planning documents. The basis for this determination is provided below.
- ☐ Changes in program implementation warrant a revision to one or more of the planning documents. Specifically,

The effectiveness of the existing SRRE program elements continue to improve each year, which in turn helps the Regional Agency move toward the 50% diversion goal. It is unknown at this time whether the 50% diversion goal will be achieved and/or maintained in the future for a number of reasons. The county, as a rural community does not have the resources or the economies of scale to implement many programs that larger, urban communities have at their disposal. The rural nature, distance to recycling markets, and small quantity of waste produced, as well as inherent low waste generation rates create significant challenges in achieving further waste reduction and disposal that currently exists. The programs and program level commitments currently being implemented by the Regional Agency are believed to be the maximum feasible for the agency and its communities given the funding limitations and economic health of Sierra county and its community. In light of these limitations, it may be necessary for the Regional Agency to request a Petition for Reduction in Goals in the future.

Section 4.6 Changes in Available Markets for Recyclable Materials

The following discusses any changes in available markets for recyclable materials **including** a determination as to whether these changes affect the adequacy of the CIWMP or RAIWMP such that a revision to one or more of the planning documents is needed.

The feasibility of recycling programs within the county continues to be challenged by the limited economies of scale and the distances to recycling markets. Almost all of the county's recycling programs require some subsidization and the income from sales of recyclable materials are not

STATE OF CALIFORNIA
(12/04)

INTEGRATED WASTE MANAGEMENT BOARD

significant. From the county's perspective, there have been no significant changes in the markets for recyclable materials.

One of the more notable examples of limited market opportunities is newspaper recycling. The Regional Agency's SRRE projected a 60% diversion rate for this commodity. However, a newspaper recycling program has not been implemented within the county to date due to funding limitations.

Section 4.7 Changes in the Implementation Schedule

Below is discussion of changes in the implementation schedule and a determination as to whether these changes affect the adequacy of the CIWMP or the RAIWMP such that a revision to one or more of the planning documents is necessary.

There have been no significant changes in the implementation schedule of the IWMP Elements.

SECTION 5.0 OTHER ISSUES

The following addresses any other significant issues/changes in the regional agency and whether these changes affect the adequacy of the CIWMP or RAIWMP such that a revision to one or more of the planning documents is needed.

N/A

SECTION 6.0 ANNUAL REPORT REVIEW

☒ The Annual Reports for each jurisdiction in the regional agency have been reviewed, specifically those sections that address the adequacy of the CIWMP or RAIWMP elements. No jurisdictions reported the need to revise one or more of these planning documents.

☐ The Annual Reports for each jurisdiction in the have been reviewed, specifically those sections that address the adequacy of the CIWMP or RAIWMP elements. The following jurisdictions reported the need to revise one or more of these planning documents, as listed:

The discussion below addresses the regional agency's evaluation of the Annual Report data relating to planning document adequacy and includes determination regarding the need to revise one or more of these documents.

STATE OF CALIFORNIA
(12/04)

INTEGRATED WASTE MANAGEMENT BOARD

SECTION 7.0 SUMMARY of FINDINGS by REGIONAL AGENCY

The Sierra Regional Agency finds that the IWMP continues to serve as adequate planning tools for implementing and monitoring compliance with the AB939 programs. Most of the waste programs identified in the plan documents are being implemented. Although a few programs have been revised, overall program implementation has been discussed in the annual reports and the PARIS has been kept updated. The overall framework of the IWMP is adequate for the Regional Agency's future compliance and program needs. The goals, objectives, policies, waste management infrastructure, funding sources, and responsible administrative units in the IWMP continue to be adequate. Therefore, the Regional Agency does not feel that revision of its IWMP is warranted or desirable at this time.

SECTION 8.0 REVISION SCHEDULE (if any)

N/A

SECTION 9.0 SUPPLEMENTARY INFORMATION (if any)

- Attachment Nos. 1, 2, 3, and 4
- Appendix A - January 18, 2006 Letter to Tim Beals, Re: Sierra Regional Agency Integrated Waste Management Plan 5-Year Review
- Appendix B - January 18, 2006 LTF Letter on 5-Year Review
-
-

Attachment No. 1

The Regional Agency's Siting Element (SE) identifies the goals and policies necessary to insure the environmentally sound disposal of waste within the County. The SE identifies the Loyalton Landfill as the waste disposal facility available to the Regional Agency to accommodate waste disposal for a minimum of 15 years, which is a requirement of the SE pursuant to state regulations. The Loyalton Sanitary Landfill is the only permitted disposal facility within the county. The disposal capacity at the Loyalton Sanitary Landfill on January 1, 1990 was estimated to have been 167,000 tons (334,000 cubic yards). Based upon waste projections made in the SE, it was projected that the landfill would serve the county's needs until the year 2043. More recently, in a letter dated March 13, 2003, the Central Valley Regional Water Quality Control Board prohibited the disposal of waste outside the current waste disposal boundaries of the Loyalton Landfill unless it is lined in accordance with State Subtitle D requirements. This restriction could limit the life of the landfill if it is found that the lining of the remaining portions of the landfill is not economically feasible and the landfill operation is restricted to the current foot print.

In order to determine what impact this could impose on the landfill's capacity, a survey was performed by Avalex for the Sierra County Department of Public Works on October 28, 2003. This survey identified approximately 12 acres of land as having been utilized for waste disposal at the landfill. Based upon this aerial extent of waste disposal, *it was* preliminarily estimated *that* 180,000 cubic yards (~45,000 tons) of capacity remains at the landfill or approximately 13 years of remaining life assuming that waste is disposed to the original grades proposed in the September 1999 Preliminary Closure and Post-closure Maintenance Plan. If the landfill is redesigned to a final grade 10 feet higher than that originally proposed an additional 60,000 cubic yards (~15,000 tons) of disposal capacity could be attained. This would provide approximately six additional years of capacity for a total remaining life of 19 years.

The County is currently in the process of evaluating the feasibility of lining the landfill and/or possibly redesigning the landfill to comply with the Regional Water Quality Control Board directives. It is anticipated that a final decision will be made as to whether lining the landfill is feasible and a redesign of the landfill operation completed over the course of the current year. Depending upon the outcome of this work, a revision to the SE may be necessary to address any significant departures in the landfill's projected service life. Waste disposal quantities to the landfill have been very consistent with those originally projected in the Agency's SE. It is noted that waste disposal estimates in the SE assumed a countywide diversion rate of 26.6% as opposed to the 50% diversion goal estimates contained within the SRRE.

Attachment No. 2

Nearly all of the programs identified in the original IWMP elements have been implemented. Program additions not initially identified in the IWMP have been reported in subsequent annual reports following their implementation. Notable program changes are summarized in the above discussions entitled *IWMP Summary and Comments*.

Source Reduction and Recycling Element (SRRE) The Regional Agency's SRRE programs are built around the county's existing waste management structure that consists of the public drop-off centers at the county's four transfer stations (Alleghany, Ramshorn, Sierra City, and Sattley), the county Loyaltown Landfill, and private waste collection services for commercial and residential customers offered through private waste haulers.

There are presently 29 individual programs identified in the SRRE and current annual reports, which are classified within five broad program types: *Source Reduction Programs*, *Recycling Programs*, *Composting Programs*, *Special Waste Programs*, and *Education and Public Information Programs*. These source reduction and recycling programs are implemented both directly through the county and indirectly through the county's coordination with others (e.g. the School District, Other Governmental Entities, and Private Waste Contractors) and by private individuals and businesses within the county.

Source Reduction Programs identified in the SRRE and annual reports include the following: 1) backyard and on-site composting/mulching, 2) procurement policies for county offices, 3) other governmental source reduction programs, and 4) other source reduction programs. Each of these programs is presently being implemented in the county. In addition to these documented programs, three other source reduction programs were identified as having been implemented within the county. These programs include source reduction measures implemented by local businesses such as source reduction at local grocery stores through the use of reusable canvas shopping bags, business equipment salvage operations, electronic media (1020-SR-BWR Business Source Reduction); source reduction measures implemented by schools (1040-SR-SCH School Source Reduction); and the exchange of reusable materials by county residents at garage sales, thrift stores, etc. (1060-SR-MTE Material Exchange, Thrift Shops). These additional programs should be included in the next annual report to the CIWMB as an update to the existing program information.

The SRRE contains eight *Recycling Programs* that target the following recyclable material types: cardboard, newspapers, PET plastic containers, HDPE plastic containers, glass containers, glass CRV containers, other glass materials, aluminum cans, scrap metal, white goods, yard waste, food waste, tires, wood waste, yard waste, inert wastes, and auto bodies. These programs are identified within the SRRE and annual reports under the following categories: 1) Residential Curbside, 2) Residential Drop-Off, 3) Residential Buy-back, 4) Commercial Self Haul, 5) School Recycling Programs, 6) Government Recycling Programs, 7) Special Collection Seasonal (regular), and 8) Special Collection Events. Programs under these categories are presently being implemented with the exception of the Residential Curbside and Residential Buy-back recycling programs. The Residential Curbside recycling program was not included in the original SRRE, but was subsequently added as a planned future program that would be implemented within the county as a means of improving diversions of recyclable materials if needed. This program would consist of the separate curbside pickup of selected recyclable materials at the

curb for those residents and businesses serviced by private waste haulers. The Residential Buy-back recycling program was described as an option within the original SRRE plan. This program, which would encompass establishing a certified buyback center for CRV containers at either the county transfer stations or landfill as a service to county residents, has not been implemented and is not envisioned in the near future.

In addition to the recycling programs listed above, one other recycling program was identified as having been implemented within the county. This program is the commercial on-site pickup of recyclable materials (2030-RC-OSP Commercial On-site Pickup), which includes the separate collection of cardboard and other recyclable materials at county businesses. This additional program should be included in the next annual report to the CIWMB as an update to the existing program information.

Of those items targeted for recycling under the SRRE, only newspaper recycling is presently not performed. Recycling of all other targeted waste materials is being accomplished to some extent.

The SRRE contains a *Composting Program* that targets residential and public wood waste. These wastes are to be occasionally chipped at the transfer stations and landfill, and at other public work locations and subsequently used as mulch. The program is currently being implemented by county staff based upon funding availability. Although this program is identified in the SRRE, it has not been included in the county's annual reports to date. This oversight should be corrected in future annual reports to the CIWMB.

The SRRE contains eight *Special Waste Programs* targeting ash disposal, sludge disposal, tires, white goods, scrap metal, wood waste, concrete/asphalt/rubble, and other special waste disposal. Ash from the co-generation operations in Loyalton is not land-filled, but rather reused. Sludge disposal is and continues to be prohibited at the Loyalton landfill. Tires, white goods, scrap metal, wood waste, concrete/asphalt/rubble, and other special wastes continue to be separated and collected at the landfill for recycling. The *Special Waste Programs* do not require any update to information.

The SRRE contains three *Education and Public Information Programs* utilizing 1) printed material distributed by the county by a number of means, 2) community outreach and technical assistance, and 3) school centered programs. These programs continue to be implemented and do not require any update to information.

Household Hazardous Waste Element (HHWE) The goals of the Regional Agency's HHWE are to prevent the disposal of household hazardous waste at the county's landfill, and to provide for the safe collection of waste material and subsequent reuse or disposal. The HHWE also encourages the use of nonhazardous alternatives when possible.

The HHWE identifies a number of programs to meet these goals. The first program is a waste screening program that is implemented by county staff at each of the county's transfer stations and at the landfill. This program requires that county staff inspect both self haul and commercial hauler wastes through a formal load-checking program. The HHWE also provides for the collection and storage of certain approved household hazardous wastes at the transfer stations and landfill for subsequent removal and reuse or disposal. Materials that are collected include antifreeze, batteries, oil, oil filters, paint, and certain electronic materials or e-waste. For those wastes that can not be collected at the county's transfer stations and landfill, the HHWE provides that periodic collection events be performed. These events are

described in the HHWE as occurring on an annual or twice annual basis. However, due to funding limitations, these events have typically not occurred with this frequency in the past. The LTF in their comments to the County recommended that the appropriate funding be provided to annual solid waste budget to accommodate the annual HHW collection events.

New state laws adopted since the year 2000 have also created "universal waste rules" that apply to a number of common household hazardous wastes such as fluorescent lamps, mercury switches, mercury thermometers and thermostats, CRT, waste batteries, e-waste materials, and aerosol cans. These more recent rules have resulted and will result in changes to how the county manages these materials at the transfer stations and landfill. In order to incorporate these changes into the HHWE, it is necessary that updated program description be included in the regional agency's next annual report to the CIWMB. The CIWMB has indicated that a jurisdiction is not required to amend its HHWE for the sole purpose of updating the implementation of these new waste programs.

Attachment No. 3

Nondisposal Facility Element (NDFE) The Regional Agency's NDFE includes a description of the existing and proposed facilities required to implement the SRRE. The NDFE describes the county's four transfer stations at Alleghany, Ramshorn, Sierra City, and Sattley. In reviewing the descriptions in the NDFE it was observed that some minor changes in the facility descriptions and hours of operation have occurred. These minor changes themselves do not constitute a significant change that would require formally revising the NDFE. However, updated information on the facilities will be provided as an addendum to the NDFE. The NDFE will also be amended to reflect the current Special Use Permit conditions from the U.S. Forest Service. The current Special Use Permit will be due for renewal in 2007.

Attachment No. 4

The Siting Element should be updated to clarify that a C&D ordinance is not warranted for adoption by the County at this time due to the low amounts of C&D that are generated in the County.

As noted in the discussion concerning waste disposal capacity, it is estimated that there is an estimated 19 years of landfill capacity remaining at the Loyalton Landfill within the current waste disposal footprint. This capacity is significantly less than the estimated 37 years under the original landfill design that provided for waste disposal on the southern half of the landfill property. The county is currently considering the feasibility of lining this portion of the landfill. When the county completes this analysis and formally amends the landfill's operation and maintenance plan, updated site life estimates should be included in the Siting Element.

Appendix A

**January 18, 2006 Letter to Tim Beals, Re: Sierra Regional
Agency Integrated Waste Management Plan 5-Year Review**



AVALEX INC.

Civil Engineering & Environmental Services

January 18, 2005

Mr. Tim H. Beals, Director
Sierra County Department of Public Works
P.O. Box 98
Downieville, California 95936

Re: Sierra Regional Agency Integrated Waste Management Plan 5-Year Review

Dear Mr. Beals:

Pursuant to your request, we have reviewed the Sierra Regional Agency Integrated Waste Management Plan documents and summarize herein our comments concerning their adequacy and whether they need to be revised. Our review has found that the documents and the corresponding Planning Annual Report Information System (PARIS) for the County reports to the California Integrated Waste Management Board (CIWMB or Waste Board) continue to serve as adequate tools for implementing and monitoring compliance with the California Integrated Waste Management Act, which mandated that all jurisdictions achieve waste diversion rates of 25% and 50% by the years 1995 and 2000. Most of the waste programs identified in the plan documents are being implemented. Although there have been some changes in program implementation, schedules, costs, and results, these changes are not considered to be significant enough to warrant a formal revision of the plan documents by the Regional Agency at this time. It is, however, recommended that updated program descriptions and program status be included in the next annual report to the CIWMB and included as addendum to the program documents.

The following table summarizes the percentage of waste diversion within Sierra County as determined under the CIWMB waste diversion calculation system.

Sierra County Diversion Rate Trends (1998-2003) *

Year	Percent Diversion
1997	19%
1998	11%
1999	29%
2000	13%
2001	23%
2002	32%
2003	16%

* Source: CIWMB Website - Diversion Measurement.

591 Tahoe Keys Blvd., Suite D6
Mailing Address:
Post Office Box 550218
South Lake Tahoe, CA 96155

Phone: (530) 543-3200
Fax: (530) 543-3201
Email: avaalex@avaalex.info

Background and Legal Requirements

The California Integrated Waste Management Act of 1989 (AB 939) requires that all counties prepare and submit to the CIWMB a Countywide Integrated Waste Management Plan (IWMP), or alternatively for a regional agency, a Regional Agency IWMP. These plans consist of a Source Reduction and Recycling Element (SRRE); a Household Hazardous Waste Element (HHWE); a Nondisposal Facility Element (NDFE); a Countywide Siting Element (SE); and a Summary Plan (SP). In conformance with these requirements, Sierra County and the City of Loyalton created a regional agency known as the "Sierra Regional Agency" and prepared a joint Regional Agency IWMP. These plan documents were approved by the CIWMB on February 23, 1999.

PRC section 41770 of the State law requires that the elements comprising the IWMP be reviewed and revised if necessary every five years after the original IWMP approval date. As part of this review, a Local Task Force (LTF) must review and submit written comments on the IWMP and a 5-Year Review report must be prepared and submitted to the CIWMB. The focus of the Five-Year Review is to determine if the planning documents are still adequate and to correct any deficiencies. The specific review requirements are outlined in Title 14, CCR Section 18788.

Title 14, CCR section 18788 stipulates that prior to the fifth anniversary of Board approval of the IWMP, a LTF shall complete a review of the IWMP to assure that the county's or regional agency's waste management practices remain consistent with the hierarchy of waste management practices defined in PRC section 40051. The review, submittal, and approval process identified in Title 14, CCR section 18788 provides that:

- Prior to the 5th anniversary of Waste Board approval of the IWMP, the LTF shall submit written comments on areas of the IWMP which require revision, if any, to the county or regional agency and to the Waste Board.
- Within 45 days of receiving the LTF comments, the county or regional agency shall determine if a revision is necessary and notify the LTF and the Board of its findings in an IWMP Review Report.
- Within 90 days of receipt of the IWMP Review Report, the Waste Board shall review the county's or regional agency's report and, at a public hearing, approve or disapprove the county's or regional agency's findings.

CCR 18788 also identifies the minimum issues which are to be addressed in the IWMP Review Report. These are:

- Changes in demographics in the county.
- Changes in quantities of the waste within the county.
- Changes in funding sources for administration of the countywide siting element and summary plan.
- Changes in administrative responsibilities.
- Changes in program implementation status.
- Changes in permitted disposal capacity and quantities of waste disposed of in the county.
- Changes in available markets for recyclable materials.

- Changes in the implementation schedule.

A county's or regional agency's Five-Year IWMP Review Report is a comprehensive analysis regarding the continuing adequacy of the individual planning documents (SRRE, HHWE, NDFE, SE, SP) that make up its IWMP since those documents were first adopted. The Review Report must provide a determination as to whether one or more of these documents need to be revised and the basis for that decision. The Waste Board's Legal staff has determined that jurisdictions can utilize their Annual Reports to the Board to update program information for the IWMP documents when the updates are consistent with the general goals and policies of the plan elements and are not considered a plan revision. Hence, the 5-Year Review analysis should discuss whether the current planning documents are sufficiently updated via Annual Reports. If a revision is determined necessary, the Five-Year IWMP Review Report must include a revision schedule for the applicable planning documents.

Jurisdictions that have determined that a Five-Year revision is necessary may include the revision under cover of the existing Annual Report document that is to be submitted to the Waste Board for that year. The procedures set forth in 14 CCR 18788 must still be complied with before the Waste Board can consider approval of the Five-Year revision document.

IWMP Summary and Comments

The following paragraphs provide a summary of the Regional Agency's IWMP elements (SRRE, HHWE, NDFE, SE, SP) and the status of the plan element implementation.

Source Reduction and Recycling Element (SRRE) The Regional Agency's SRRE programs are built around the county's existing waste management structure that consists of the public drop-off centers at the county's four transfer stations (Alleghany, Ramshorn, Sierra City, and Sattley), the county Loyalton Landfill, and private waste collection services for commercial and residential customers offered through private waste haulers.

There are presently 29 individual programs identified in the SRRE and current annual reports, which are classified within five broad program types: *Source Reduction Programs*, *Recycling Programs*, *Composting Programs*, *Special Waste Programs*, and *Education and Public Information Programs*. These source reduction and recycling programs are implemented both directly through the county and indirectly through the county's coordination with others (e.g. the School District, Other Governmental Entities, and Private Waste Contractors) and by private individuals and businesses within the county.

Source Reduction Programs identified in the SRRE and annual reports include the following: 1) backyard and on-site composting/mulching, 2) procurement policies for county offices, 3) other governmental source reduction programs, and 4) other source reduction programs. Each of these programs is presently being implemented in the county. In addition to these documented programs, three other source reduction programs were identified as having been implemented within the county. These programs include source reduction measures implemented by local businesses such as source reduction at local grocery stores through the use of reusable canvas shopping bags, business equipment salvage operations, electronic media (1020-SR-

BWR Business Source Reduction); source reduction measures implemented by schools (1040-SR-SCH School Source Reduction); and the exchange of reusable materials by county residents at garage sales, thrift stores, etc. (1060-SR-MTE Material Exchange, Thrift Shops). These additional programs should be included in the next annual report to the CIWMB as an update to the existing program information.

The SRRE contains eight *Recycling Programs* that target the following recyclable material types: cardboard, newspapers, PET plastic containers, HDPE plastic containers, glass containers, glass CRV containers, other glass materials, aluminum cans, scrap metal, white goods, yard waste, food waste, tires, wood waste, yard waste, inert wastes, and auto bodies. These programs are identified within the SRRE and annual reports under the following categories: 1) Residential Curbside, 2) Residential Drop-Off, 3) Residential Buy-back, 4) Commercial Self Haul, 5) School Recycling Programs, 6) Government Recycling Programs, 7) Special Collection Seasonal (regular), and 8) Special Collection Events. Programs under these categories are presently being implemented with the exception of the Residential Curbside and Residential Buy-back recycling programs. The Residential Curbside recycling program was not included in the original SRRE, but was subsequently added as a planned future program that would be implemented within the county as a means of improving diversions of recyclable materials if needed. This program would consist of the separate curbside pickup of selected recyclable materials at the curb for those residents and businesses serviced by private waste haulers. The Residential Buy-back recycling program was described as an option within the original SRRE plan. This program, which would encompass establishing a certified buyback center for CRV containers at either the county transfer stations or landfill as a service to county residents, has not been implemented and is not envisioned in the near future.

In addition to the recycling programs listed above, one other recycling program was identified as having been implemented within the county. This program is the commercial on-site pickup of recyclable materials (2030-RC-OSP Commercial On-site Pickup), which includes the separate collection of cardboard and other recyclable materials at county businesses. This additional program should be included in the next annual report to the CIWMB as an update to the existing program information.

Of those items targeted for recycling under the SRRE, only newspaper recycling is presently not performed. Recycling of all other targeted waste materials is being accomplished to some extent.

The SRRE contains a *Composting Program* that targets residential and public wood waste. These wastes are to be occasionally chipped at the transfer stations and landfill, and at other public work locations and subsequently used as mulch. The program is currently being implemented by county staff based upon funding availability. Although this program is identified in the SRRE, it has not been included in the county's annual reports to date. This oversight should be corrected in future annual reports to the CIWMB.

The SRRE contains eight *Special Waste Programs* targeting ash disposal, sludge disposal, tires, white goods, scrap metal, wood waste, concrete/asphalt/rubble, and other special waste disposal. Ash from the co-generation operations in Loyaltown is not land-filled, but rather reused. Sludge disposal is and continues to be prohibited at the Loyaltown landfill. Tires, white goods, scrap metal, wood waste, concrete/

asphalt/rubble, and other special wastes continue to be separated and collected at the landfill for recycling. The *Special Waste Programs* do not require any update to information.

The SRRE contains three *Education and Public Information Programs* utilizing 1) printed material distributed by the county by a number of means, 2) community outreach and technical assistance, and 3) school centered programs. These programs continue to be implemented and do not require any update to information.

Household Hazardous Waste Element (HHWE) The goals of the Regional Agency's HHWE are to prevent the disposal of household hazardous waste at the county's landfill, and to provide for the safe collection of waste material and subsequent reuse or disposal. The HHWE also encourages the use of nonhazardous alternatives when possible.

The HHWE identifies a number of programs to meet these goals. The first program is a waste screening program that is implemented by county staff at each of the county's transfer stations and at the landfill. This program requires that county staff inspect both self haul and commercial hauler wastes through a formal load-checking program. The HHWE also provides for the collection and storage of certain approved household hazardous wastes at the transfer stations and landfill for subsequent removal and reuse or disposal. Materials that are collected include antifreeze, batteries, oil, oil filters, paint, and certain electronic materials or e-waste. For those wastes that can not be collected at the county's transfer stations and landfill, the HHWE provides that periodic collection events be performed. These events are described in the HHWE as occurring on an annual or twice annual basis. However, due to funding limitations, these events have typically not occurred with this frequency.

New state laws adopted since the year 2000 have also created "universal waste rules" that apply to a number of common household hazardous wastes such as fluorescent lamps, mercury switches, mercury thermometers and thermostats, CRT, waste batteries, e-waste materials, and aerosol cans. These more recent rules have resulted and will result in changes to how the county manages these materials at the transfer stations and landfill. In order to incorporate these changes into the HHWE, it is necessary that updated program description be included in the regional agency's next annual report to the CIWMB. The CIWMB has indicated that a jurisdiction is not required to amend its HHWE for the sole purpose of updating the implementation of these new waste programs.

Nondisposal Facility Element (NDFE) The Regional Agency's NDFE includes a description of the existing and proposed facilities required to implement the SRRE. The NDFE describes the county's four transfer stations at Alleghany, Ramshorn, Sierra City, and Sattley. In reviewing the descriptions in the NDFE it was observed that some minor changes in the facility descriptions and hours of operation have occurred. These minor changes themselves do not constitute a significant change that would require formally revising the NDFE. However, updated information on the facilities should be provided as an addendum to the NDFE.

It is also noted that the USFS Special Use Permits under which the county operates at the Alleghany, Ramshorn, and Sierra City sites have expired and new permits will have to be obtained.

Countywide Siting Element (SE) The Regional Agency's SE identifies the goals and policies necessary to insure the environmentally sound disposal of waste within the County. The SE identifies the Loyalton Landfill as the waste disposal facility available to the Regional Agency to accommodate waste disposal for a minimum of 15 years, which is a requirement of the SE pursuant to state regulations.

The Loyalton Sanitary Landfill is the only permitted disposal facility within the county. The disposal capacity at the Loyalton Sanitary Landfill on January 1, 1990 was estimated to have been 167,000 tons (334,000 cubic yards). Based upon waste projections made in the SE, it was projected that the landfill would serve the county's needs until the year 2043.

More recently, in a letter dated March 13, 2003, the Central Valley Regional Water Quality Control Board has prohibited the disposal of waste outside the current waste disposal boundaries of the Loyalton Landfill unless it is lined in accordance with State Subtitle D requirements. This restriction could limit the life of the landfill if it is found that the lining of the remaining portions of the landfill is not economically feasible and the landfill operation is restricted to the current foot print. In order to determine what impact this could impose on the landfill's capacity, a survey was performed by Avalex for the Sierra County Department of Public Works on October 28, 2003. This survey identified approximately 12 acres of land as having been utilized for waste disposal at the landfill. Based upon this aerial extent of waste disposal, we preliminarily estimated 180,000 cubic yards (~45,000 tons) of capacity remains at the landfill or approximately 13 years of remaining life assuming that waste is disposed to the original grades proposed in the September 1999 *Preliminary Closure and Post-closure Maintenance Plan*. If the landfill is redesigned to a final grade 10 feet higher than that originally proposed an additional 60,000 cubic yards (~15,000 tons) of disposal capacity could be attained. This would provide approximately six additional years of capacity for a total remaining life of 19 years.

The County is currently in the process of evaluating the feasibility of lining the landfill and/or possibly redesigning the landfill to comply with the Regional Water Quality Control Board directives. It is anticipated that a final decision will be made as to whether lining the landfill is feasible and a redesign of the landfill operation completed over the course of the current year. Depending upon the outcome of this work, a revision to the SE may be necessary to address any significant departures in the landfill's projected service life.

Summary Plan (SP) A Summary Plan, which is a summation of the other IWMP elements, is not required to be prepared for the Regional Agency.

Title 14 California Code of Regulations Section 18788(3) Requirements

Title 14 CCR 18788(3) requires that the following minimum issues be addressed in the IWMP 5-Year Review Report. The following section summarizes the changes and trends in demographics and waste generation within Sierra County.

Changes in Demographics in the County The Regional Agency's annual waste diversion amounts are calculated annually by the CIWMB using the "adjustment factor method" which takes the agency's initial base year (1991) waste generation quantity and adjusting it for changes in the following demographic and economic factors: population growth, employment, taxable sales and the consumer price

Consumer Price Index *	1991	2003	% Change
Statewide CPI	140.6	190.4	20.1%

* Source: CIWMB Website - Default Adjustment Factors.

The observed changes in demographic trends within the county as summarized above do not vary appreciable from those assumed in the original SRRE and hence the waste projections made in the SRRE are reasonably accurate and do not require revision.

Changes in Quantities of the Waste within the County

Waste disposal within the county over the period 1991 to 2003 ranged from a low of 2,391 tons to a high of 3,253 tons as summarized in the table below. These quantities have been relatively consistent over the reporting period.

Waste Disposal Amounts (tons)													
Year	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003
	3253	3179	3211	3243	2796	2391	2818	2525	2399	2820	2621	2420	2748

Waste diversion within the county as determined using the CIWMB's "adjustment factor method" is summarized below for the years 1997 to 2003. The regional agency as a small waste generator is highly sensitive to even relatively minor changes in waste generation. Some of these changes, for example a natural disaster cleanup, are not accounted for under the CIWMB's "adjustment factor method" and hence the regional agency's estimated diversion rates are not considered accurate during some of the reporting years.

Waste Diversion Rates (%)							
Year	1997	1998	1999	2000	2001	2002	2003
	19%	11%	29%	13%	23%	32%	16%

The Regional Agency's SRRE proposed as a goal a diversion rate of 50% by the year 2000 consistent with the statewide diversion goal. However, this level of diversion has not been achieved by the Regional Agency to date. This non-attainment is evident when comparing the projected waste disposal amounts for the year 2000 (1783 tons) with the actual reported disposal amount for that year (2820 tons). Because these projected versus actual differences are so significant when a 50% diversion goal is assumed, it was decided that the regional agency's initial SRRE diversion estimates of 26.6% would be used in estimating the remaining life period of the landfill for the SE projections. These waste disposal projections have matched very well with actual waste disposal amounts reported to date.

Comparison of SRRE 2000 Projected Disposal Tonnage vs. 2000 Reported Disposal Tonnage			
	SRRE Projected	Reported	% Difference
Sierra Regional Agency	1783	2820	58%

index. These adjustments provide an estimated reporting year waste generation amount against which actual waste disposal is then compared with the difference between the two values being the amount of estimated diversion. Hence, changes in these demographic factors correspondingly result in changes to the estimated amounts of waste generation and diversion. The accuracy of this method in providing waste generation estimates for Sierra County is questionable as it appears that the method overestimates the significance of employment and taxable sales in comparison to that of the general county population.

In terms of population, Sierra County is the second smallest county in the state. The population of the County as estimated in 1991 and 2003 was 3,318 and 3,560 respectively as summarized in the table below. This represents a 7.6% increase over the 12 year period, or an average annual rate of population growth of approximately 0.7%, which is generally consistent with the County's expected rate of growth as projected within the original SRRE.

Population *	1991	2003	% Change
Countywide Population	3,318	3,560	7.6%

* Source: CIWMB Website - Default Adjustment Factors.

Employment within the County is reported to have dropped from 950 to 810 persons during the period 1991 to 2003 as summarized in the table below. This represents a 14.7% reduction in employment. A more stable employment figure is likely to be seen in the future within the County.

Employment *	1991	2003	% Change
Countywide Employment	950	810	-14.7%

* Source: CIWMB Website - Default Adjustment Factors.

Taxable sales within the County (as separately determined using different methodologies and reported as the Sierra County Regional Agency and as the County) increased during the period 1991 to 2003 as summarized in the table below. This general upward trend is within the expected range of increased taxable sales.

Taxable Sales *	1991 (x1000)	2003 (x1000)	% Change
Sierra County Regional Agency	8,512	11,792	38.5%
Countywide Taxable Sales Transactions	13,907	20,803	7%

* Source: CIWMB Website - Default Adjustment Factors.

The State wide Consumer Price Index (CPI) rose 20.1% during the period 1991 to 2003 as summarized in the table below.

Changes in Funding Sources for Administration of the Countywide Siting Element and Summary Plan.

No changes have occurred in the basic funding sources for the administration of the CSE and the Summary Plan. Parcel assessments, service fees, grant funds, tax revenues, and solid waste management fees are still the source of funds for IWMP program development, implementation, and monitoring.

Changes in Administrative Responsibilities.

No changes have occurred in the administration of the IWMP. The County Public Works Department is the chief County administrative unit responsible for AB 939 and waste management programs.

Changes In Program Implementation Status.

Nearly all of the programs identified in the original IWMP elements have been implemented. Program additions not initially identified in the IWMP have been reported in subsequent annual reports following their implementation. Notable program changes are summarized in the above discussions entitled *IWMP Summary and Comments*.

Changes In Permitted Disposal Capacity And Quantities Of Waste Disposed Of In The County.

Waste disposal within the county is provided at the county owned and operated Loyaltan Landfill, which serves as the primary waste disposal facility for county generated wastes. Minor amounts of waste disposal are accomplished outside the county for certain special waste types not accepted at the landfill (e.g., petroleum contaminated soils) and wastes generated at the county border communities of Verdi and LaPorte.

As noted in the earlier discussion on the Siting Element (SE), it is estimated that there is an estimated 19 years of landfill capacity remaining at the Loyaltan Landfill within the current waste disposal footprint. This capacity is significantly less than the estimated 37 years under the original landfill design that provided for waste disposal on the southern half of the landfill property. The county is currently considering the feasibility of lining this portion of the landfill.

Waste disposal quantities to the landfill have been very consistent with those originally projected in the Agency's Siting Element. As noted earlier, these waste disposal estimates assumed a countywide diversion rate of 26.6% as opposed to the 50% diversion goal estimates contained within the SRRE. Improvements in the waste diversion percentage within the county towards the 50% goal would help extend the life of the landfill.

Changes in Available Markets for Recyclable Materials.

The feasibility of recycling programs within the county continues to be challenged by the limited economies of scale and the distances to recycling markets. Almost all of the county's recycling programs require some subsidization and the income from sales of recyclable materials are not significant. From the county's perspective, there have been no significant changes in the markets for recyclable materials.

One of the more notable examples of limited market opportunities is newspaper recycling. The Regional Agency's SRRE projected a 60% diversion rate for this

commodity. However, a newspaper recycling program has not been implemented within the county to date due to funding limitations.

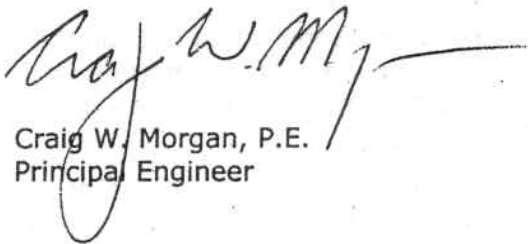
Changes in The Implementation Schedule.

There have been no significant changes in the implementation schedule of the IWMP Elements.

In summary, as has been noted in the foregoing discussions, we believe that the Regional Agency's IWMP continues to serve as adequate planning tools for implementing and monitoring compliance with the AB939 programs. Most of the waste programs identified in the plan documents are being implemented. Although there have been some changes in program implementation, these changes are not considered to be significant enough to warrant a formal revision of the plan documents by the Regional Agency at this time. If you have questions concerning the summary information in this letter, please call me at (530) 543-3200. As always, we look forward to assisting you and the County in its solid waste program planning efforts.

Sincerely,

AVALEX INC.

A handwritten signature in black ink, appearing to read "Craig W. Morgan", with a long horizontal flourish extending to the right.

Craig W. Morgan, P.E.
Principal Engineer

Appendix B

January 18, 2006 LTF Letter on 5-Year Review

**SIERRA COUNTY
SOLID WASTE TASK FORCE**
P.O. Box 98
Downieville, CA 95936
(530) 289-3201
publicworks@sierracounty.ws

January 18, 2006

Sierra County Regional Agency
P.O. Box 98
Downieville, CA 95936

The Sierra County Solid Waste Task Force (LTF) met on November 3, 2005 and December 16, 2005 and discussed the 5-year review of the Sierra County Regional Agency Integrated Waste Management Plan, as required by the Public Resources Code (PRC) Section 41770 and Title 14 of the California Code of Regulations (Section 18788). The purpose of the review was to determine if the Sierra County Waste Management Plan (SCWMP) required revisions to reflect current efforts being made to meet the requirements of AB939.

Based on its review, the LTF does not feel the SCWMP requires a "revision" at this time. This conclusion is based on the fact that the annual reports submitted by the Sierra County Department of Public Works have provided updated information concerning the status of program implementation on a yearly basis. These annual reports note that the programs remain consistent with the waste management practices defined in PRC 40051.

However, the LTF recommends that:

- 1) The Source Reduction and Recycling Element, although not necessitating a revision, will be updated to include new programs (as outlined by Craig Morgan) that were not updated in the Annual Report.
- 2) The Household Hazardous Waste Element needs no revisions but efforts need to be made to implement a program offering annual pickup of hazardous waste. The LTF recommends that the County consider appropriations to the annual solid waste budget to accommodate such an activity.
- 3) The Non-Disposal Facility Element, although not necessitating a revision, will include current facility descriptions and maps and include the Forest Service Special Use Permits which will be due for renewal in 2007.
- 4) The Siting Element should be updated to clarify that a C&D ordinance is not warranted for adoption by the County at this time due to the low amounts of C&D that are deposited in the County. Additionally, the 15 year disposal capacity requirement is satisfied with the addition of raising the grade 10 ft above the proposed grade in the 1999 Preliminary Closure and Post-closure Maintenance Plan. It is our suggestion that this element is updated to include this change in grade. This item may need to be revised in the next five years to accommodate possible changes to the original foot print of the County landfill as may be dictated by the Regional Water Quality Board. We are currently in discussions with the Regional Board over the landfill footprint and any operational issues that may arise. Finally, we also suggest that the Regional Agency look at alternatives for providing additional capacity and develop a plan that satisfies new requirements within the next five years.

The LTF will continue to meet on a regular basis as a advisory committee on waste management and diversion issues of countywide significance.

Sincerely,
Arnold Gutman
Chair, Sierra County Solid Waste Task Force



Cc: Natalie Lee, CIWMB